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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**GOOGLE LLC'S SUBMISSION IN  
RESPONSE TO DKT. 242**

Referral: Hon. Susan van Keulen, USMJ

Pursuant to Your Honor's August 12, 2021 Order (Dkt. 242), Google LLC ("Google") submits this statement identifying the following issues for the Court to address in due course:

- i. Dispute D3, Google's Request for Production No. 2 (Chrome device settings): Google respectfully requests that the Court order Plaintiffs to produce the Chrome Device Settings for the Named Plaintiffs' devices that they have imaged. The parties have met and conferred on this dispute, where Google represented to Plaintiffs that they may redact any sensitive, personal information that are not relevant to this case. The parties are at an impasse and this dispute is ripe for Court intervention.
- ii. Dispute P21, Mr. Pichai's ESI: Google respectfully requests that the Court defer setting a briefing schedule on this issue, at least until after Google responds to a request for production that Plaintiffs served after the Joint Submission (on August 6), which seeks officer and director documents at Google for the period January 1, 2015 to present (and thus encompasses Mr. Pichai's ESI). This issue is also premature because Plaintiffs already identified their remaining proposed custodians on August 13, which Google is evaluating.

DATED: August 13, 2021

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By /s/ Andrew H. Schapiro

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